

**Joseph A. Felo, D.O.
5165 Dickens Drive
Richmond Heights, Ohio 44143**

March 2, 2022

Mr. Larry Pleasants
Attorney at Law
7508 Madison Avenue
Indianapolis, Indiana 46227

Re: Eleanor Northington (Deceased)

Dear Mr. Pleasants:

In response to your request regarding the above-listed decedent, I have reviewed the following records for Eleanor Northington that you provided me:

1. Marion County Coroner's Office records including:
 - a. Autopsy report
 - b. Autopsy photographs
 - c. Toxicology report
2. Death certificate,
3. Indianapolis EMS report,
4. Statements from Officer Bruce Jackson, Officer Justin Hyde, Officer Ronald Monday, Officer Lane Cooper, Officer Robert Haley, Pastor Jesse Russell, Pastor Grady Brian Rodgers, and Witness Janae Journey
5. Depositions from Officer Bruce Jackson, Officer Justin Hyde, Officer Ronald Monday, Officer Lane Cooper, and Officer Robert Haley.

You asked me to review the above materials and render opinions about the cause of death and manner of death of Eleanor Northington and describe the mechanism of her death.

Briefly, Eleanor Northington was a 43-year-old female with a reported history of bipolar disorder, schizophrenia, and obesity. She was in her usual state of health on February 6, 2019, when she attended a church service. While at the service, she acted erratically and was involved in a physical confrontation with police officers. During the confrontation, she was

handcuffed with her hands behind her and placed prone on the floor. Within one to two minutes of being handcuffed and being prone on the floor, her breathing stopped, she was rolled supine, the handcuffs were removed, and resuscitative efforts were initiated. Upon EMS arrival, she had no vital signs, and during EMS transportation to the hospital, she regained a pulse, respirations, and a blood pressure. However, at the hospital, she was diagnosed with global hypoxic-ischemic encephalopathy and cerebral edema and her death was pronounced on February 7, 2019.

Eleanor Northington's body was transported to the Marion County Coroner's Office where an autopsy was performed on February 11, 2019. The examining forensic pathologist documented an abrasion of the forehead, four abrasions of the left forearm, two contusions of the maxillary gingiva, and a right-sided tongue hemorrhage. The cause of death for Eleanor Northington was determined to be anoxic brain injury in the setting of morbid obesity, cardiac hypertrophy, schizophrenia, and struggle with others, and the manner of death was undetermined.

It is my opinion, within a reasonable degree of medical certainty, that the cause of death for Eleanor Northington is hypoxic-ischemic encephalopathy due to cardiopulmonary arrest with cardiopulmonary resuscitation due to positional asphyxia in the setting of emotional and physical exertion with obesity as a contributing condition. Positional asphyxia results when a person is unable to effectively breathe because of how the body is positioned with physical force or forces that are applied to the body, preventing oxygenated air to get into the lungs. This results in decreased delivery of oxygen to the brain that then causes the person to become unconscious and die. Although Eleanor was resuscitated, her brain was starved of oxygen for too long causing her hypoxic-ischemic encephalopathy.

Her death is properly classified as a homicide because the definition of a homicide is a death that results from the action(s) of another individual(s). It was the actions of the police officers of restraining Eleanor Northington prone on the floor with her hands cuffed behind her that caused her to stop breathing and her brain to be starved of oxygen.

Eleanor Northington was active and alive while she was being handcuffed and placed on the floor prone by the police officers, but she stopped

breathing within two minutes of being restrained and ultimately died. Her death would have been prevented had she not been handcuffed and placed prone on the floor.

My opinions are based on my experience and training as a board-certified forensic pathologist and are within a reasonable degree of medical probability.

I reserve the right to supplement this report if additional information becomes available.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joseph A. Felo, D.O."

Joseph A. Felo, D.O.

Anatomic Pathologist, Clinical Pathologist, and Forensic Pathologist